

JUDGE BATTS
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

07

CV

3103

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HENRY E. MAZUREK,

Plaintiff,

Case No.

-- against --

COMPLAINT

DAVID H. BROOKS,

JURY TRIAL DEMANDED

Defendant.
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Plaintiff Henry E. Mazurek, by his attorneys, Judd Burstein, P.C., complaining of the
Defendant, alleges as follows:

JURISDICTION AND VENUE

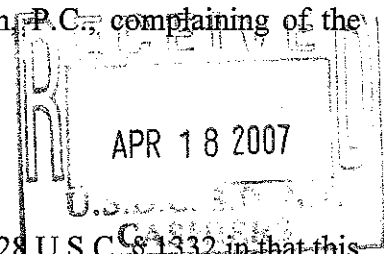
1. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1332 in that this
is a civil action between citizens of different states where the amount in controversy exceeds
\$75,000.

2. Venue lies in this District pursuant to 28 U.S.C. § 1391(a)(3) by reason of an
exclusive forum selection clause in the parties' agreement.

PARTIES

3. Plaintiff Henry E. Mazurek ("Plaintiff") is a citizen of the State of New Jersey.

4. On information and belief, although Defendant David Brooks ("Defendant") has
alleged that he is a citizen of the State of New York, he is in fact a citizen of the State of Florida.



CLAIM FOR RELIEF

5. In November 2006, the parties entered into a written agreement, on a "general retainer" basis, pursuant to which Defendant promised to pay Plaintiff \$3,000,000 for three years of service as Defendant's personal lawyer.

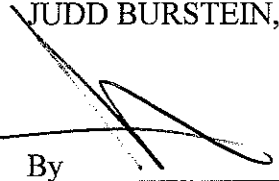
6. In reliance upon this agreement, Plaintiff, *inter alia*, resigned from a lucrative law partnership, moved to London, and performed under the parties' agreement by working virtually around the clock for Defendant until Defendant breached the parties' agreement.

7. By reason of Defendant's breach, Plaintiff has been damaged in the amount of at least \$2,000,000.

WHEREFORE, Plaintiff demands judgment as follows:

- A. Damages in the amount of at least \$2,000,000;
- B. Costs and Disbursements of this Action; and
- C. Such other and further relief as deemed just and proper by this Court.

JUDD BURSTEIN, P.C.


By _____
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